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February 2nd, 2016

Hon. Brenda K. Sannes
United States District Court
Northern District of New York
James M. Hanley Federal Building
100 S. Clinton St.
Syracuse, NY 13261

**Re: United States v. Clayton Brothers
15-CR-198 (BKS)**

Dear Judge Sannes:

I write further to my letter dated January 26th, 2016.

Due to an oversight, or word processing error, my letter failed to discuss the Traffic Violation Ticket, dated May 11th, 2014, which was attached as Exhibit "A" to my letter. The relevance of the Traffic Violation Ticket is that it demonstrates that on May 11th, 2014, John Parker still possessed a Texas driver's license which supports the Defendant's assertion that Mr. Parker did not reside at 861 Blanchard Hill Road, and that he could not have lawfully authorized or consented to a search of Mr. Brothers' residence. As the Court is well aware, the search of Mr. Brothers' residence took place at the end of April 2014, prior to the speeding ticket, and therefore one can conclude that Mr. Parker was domiciled in Texas, at all times relevant to the suppression hearing.

Respectfully,

Merchant Law Group LLP

By: _____/s_____
Daniel DeMaria

cc: AUSA Douglas G.N. Collyer